Central Valley Clean Water Association
Representing Over Fifty Wastewater Agencies

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June 18, 2012

VIA ELECTRONIC MAIL ONLY

Kevin Kratzke
Regional Water Quality Control Board
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002
kkratzke@waterboards.ca.gov

Re: Comments on the Tentative Waste Discharge Requirements for the City of Alturas Wastewater Treatment Plant

Dear Mr. Kratzke:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements (Tentative Order) for the Wastewater Treatment Plant (WWTP) of the City of Alturas (City). CVCWA is a non-profit organization representing more than 50 publicly owned treatment works throughout the Central Valley Region in regulatory matters affecting surface water discharge, land application, and water reuse. We approach these matters with a perspective to balance environmental and economic interests consistent with state and federal law. Upon reviewing the Tentative Order, we respectfully request that you revise its final effluent limitations for ammonia as described below. We further request that you provide additional detail (e.g., pH and temperature values used) regarding the calculations resulting in the ammonia limitations ultimately presented to the Central Valley Regional Water Quality Control Board (Central Valley Water Board) for consideration.

The Tentative Order includes final water quality-based effluent limitations for ammonia of 0.40 milligrams as nitrogen per liter (mg/L as N) as a monthly average limitation and 0.50 mg/L as N as a maximum daily limitation. (Tentative Order at p. 11.) The Fact Sheet of the Tentative Order explains that these effluent limitations were based in part on the 30-day criteria continuous concentration (CCC). (*Id.* at p. F-34.) In this case, the 30-day CCC was calculated using upstream paired pH and temperature data. (*Id.* at p. F-33.) The Tentative Order states:

> To evaluate effluent dominated situations, the 30-day CCC was also calculated, for comparison, using paired effluent pH and temperature and paired downstream receiving water pH and temperature. The resulting CCCs based on effluent and downstream pH and temperature are less stringent, and therefore may not be protective under all flow conditions. (*Ibid.*)

CVCWA respectfully submits that the Tentative Order's approach to calculating the CCC and ammonia limitations was inconsistent with the Central Valley Water Board's permitting practice, and otherwise improper. Rather, the 30-day CCC should have been calculated using downstream or effluent pH and temperature data since the Tentative Order does not grant dilution. (Tentative Order at pp. F-16 to F-17, F-32 to F-34.) Further, effluent limitations should not be based on the minimum of the 30-day CCCs calculated from pH and temperature pairs. For example, the method used to calculate effluent limitations for the City relied upon the *1/10th percentile* of the 30-day CCCs, instead of the minimum. (Order No. R5-2007-0063, NPDES No. CA0079197 (Atwater Permit) at Fact Sheet p. 14.) In the Atwater Permit, the Central Valley Water Board found that using the 1/10th percentile was consistent with the 1-in-3 year average frequency for criteria excursions recommended by the U.S. Environmental Protection Agency. (*Ibid.*) Similarly, a 1/10th percentile is appropriate for selecting a 30-day CCC in the City's case.

Finally, the Tentative Order does not take into account seasonal fluctuations. (See Tentative Order at pp. F-32 to F-34.) Because the effluent limitations for ammonia in the Tentative Order were calculated from the 30-day CCC, they are dependent on pH and temperature. These parameters fluctuate seasonally and thus *seasonal* effluent limitations for ammonia are appropriate for the City's discharge. Seasonal effluent limitations calculated from seasonal 30-day CCCs have been adopted for the City and other Central Valley dischargers. (See, e.g., Atwater Permit at pp. 9, 25-26; Order No. R5-2007-0132-02, NPDES No. CA0079049 (City of Davis Wastewater Treatment Plant) at pp. 9, 11, F-29 to F-32; Order No. R5-2008-0183, NPDES No. CA0077895 (University of California, Davis Main Wastewater Treatment Plant) at pp. 11, F-18 to F-20.)

CVCWA appreciates your consideration of these comments. Please contact me at (530) 268-1338 or officer@cvcwa.org if I can be of further assistance.

Sincerely,

Debbie Webster

Debbie Webster,
Executive Officer

cc (*via electronic mail*): Pamela Creedon, Central Valley Regional Water Quality Control Board
pcreedon@waterboards.ca.gov